

A CIVIL RIGHTS COMPLAINT
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

RECEIVED

DEC 20 2019

AT 8:30 _____ M
WILLIAM T. WALSH, CLERK

CARL REAVIS

COMPLAINT

V.

CIVIL ACTION NO. _____

MARCUS D. HICKS

JOHN POWELL

SHERITA LATIMORE-COLLIER

VICTORIA D'AMICO

ANTHONY THOMAS

NEW JERSEY DEPARTMENT OF CORRECTIONS

SOUTH WOODS STATE PRISON

UNIVERSITY CORRECTIONAL HEALTH CARE RUTGERS

SANDRA MUELLEN

DR. SANTANGELO

P.J. HOLDEN

CORRECT CARE SOLUTION, INC.

6. If you cannot prepay the \$400.00 fee, you may request permission to proceed in forma pauperis in accordance with the procedures set forth in the application to proceed in forma pauperis. See 28 U.S.C. §1915. (If there is more than one plaintiff, each plaintiff must separately request permission to proceed in forma pauperis.)

7. If you are given permission to proceed in forma pauperis, the \$50.00 Administrative Fee will not be assessed. The Clerk will prepare and issue a copy of the summons for each defendant. The copies of summonses and the copies of the complaint which you have submitted will be forwarded by the Clerk to the United States Marshal, who is responsible for service. The Marshal has USM-285 forms you must complete so that the Marshal can locate and serve each defendant. If the forms are sent to you, you must complete them in full and return the forms to the Marshal.

QUESTIONS TO BE ANSWERED

1a. Jurisdiction is asserted pursuant to (CHECK ONE)

☒ 42 U.S.C. §1983 (applies to state prisoners)

☐ Bivens v. Six Unknown Named Agents of Fed. Bureau of Narcotics, 403 U.S. 388 (1971) and 28 U.S.C. § 1331 (applies to federal prisoners)

If you want to assert jurisdiction under different or additional statutes, list these below:

SEE ATTACHED TITLED "JURIDICATION"

1b. Indicate whether you are a prisoner or other confined person as follows:

☐ Pretrial detainee

☐ Civilly-committed detainee

☐ Immigration detainee

☒ Convicted and sentenced state prisoner

☐ Convicted and sentenced federal prisoner

☐ Other: (please explain) _____

ASSERT JURISDICTION UNDER DIFFERENT OR ADDITIONAL STATUTES, LISTED BELOW:

THIS COURT HAS JURISDICTION PURSUANT TO 28 U.S.C. § 1331 AND § 1367 AS A RESULT OF DEFENDANTS JOINT AND/OR INDIVIDUAL ACTS IN VIOLATION OF PLAINTIFF'S RIGHTS UNDER THE FIRST, EIGHTH, AND FOURTEENTH AMENDMENTS OF THE UNITED STATES CONSTITUTION; TITLE II OF THE AMERICANS WITH DISABILITY ACT (ADA) 42 U.S.C. § 12101 ET. SEQ. AS MADE APPLICABLE TO THE INDIVIDUAL STATES BY THE FOURTEENTH AMENDMENT OF THE UNITED STATES CONSTITUTION, AND SUPPLEMENTAL STATE LAW CLAIMS PURSUANT TO THE NEW JERSEY CIVIL RIGHTS ACT (NJCRRA); AND PURSUANT TO 42 U.S.C. § 1983, § 1984 AND § 1986.

2. Previously Dismissed Federal Civil Actions or Appeals

If you are proceeding in forma pauperis, list each civil action or appeal you have brought in a federal court while you were incarcerated or detained in any facility, that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted. Please note that a prisoner who has on three or more prior occasions, while detained in any facility, brought an action or appeal in a federal court that was dismissed as frivolous or malicious, or for failure to state a claim upon which relief may be granted, will be denied in forma pauperis status unless that prisoner is under imminent danger of serious physical injury. See 28 U.S.C. § 1915(g).

a. Parties to previous lawsuit:

Plaintiff(s): NONE EVER SUBMITTED

Defendant(s): _____

b. Court and docket number: _____

c. Grounds for dismissal: () frivolous () malicious
() failure to state a claim upon which relief may be granted

d. Approximate date of filing lawsuit: _____

e. Approximate date of disposition: _____

If there is more than one civil action or appeal, describe the additional civil actions or appeals using this same format on separate sheets.

3. Place of Present Confinement? SOUTH WOODS STATE PRISON

4. Parties

(In item (a) below, place your name in the first blank and place your present address in the second blank. Do the same for additional Plaintiffs, if any.)

a. Name of plaintiff: CARL REAVIS

SOUTH WOODS STATE PRISON
215 BURLINGTON ROAD SOUTH

Address: BRIDGETON, NJ 08302

Inmate#: 1081421 / 000973897A

b. First defendant:

Name: MARCUS O. HICKS

Official position: COMMISSIONER OF D.O.C.

Place of employment: WHITTLESEY RD, P.O. Box 863, TRENTON NJ
08625 - 0863

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?) FIRST COUNT

1. NEW JERSEY DEPARTMENT OF CORRECTIONS IS CHARGED WITH THE RESPONSIBILITY TO MAINTAIN ALL OF THE NEW JERSEY STATE PRISONS AND TO MAKE CERTAIN THAT THE PRISON HOUSING UNITS FOR INMATES WITH DISABILITIES COMPLY WITH THE AMERICANS WITH DISABILITY ACT OF 1990 (ADA)

c. Second defendant:

Name: JOHN POWELL

Official position: ADMINISTRATOR OF SOUTH WOODS STATE PRISON

Place of employment: 215 BURLINGTON RD. SO, BRIDGETON, NJ 08302

How is this person involved in the case?

(i.e., what are you alleging that this person did or did not do that violated your constitutional rights?)

3. AT ALL TIMES HEREINAFTER MENTIONED, JOHN POWELL WAS THE ADMINISTRATOR OF SOUTH WOODS STATE PRISON AND WAS DIRECTLY IN CHARGE OF RUNNING SOUTH WOODS STATE PRISON WHICH INCLUDED THE SUPERVISION OF UNIVERSITY ~~HE~~ CORRECTIONAL HEALTH CARE ROTGERS, MEDICAL DIRECTOR, STAFF WORKED AT SOUTH WOODS STATE PRISON.

d. If there are more than two defendants, attach a separate sheet. For each defendant specify: (1) name, (2) official position, (3) place of employment, and (4) involvement of the defendant.

D. THIRD DEFENDANT:

NAME: SHERITA LATIMORE-COLLIER

OFFICIAL POSITION: MEDICAL DIRECTOR OF S.W.S.P.

PLACE OF EMPLOYMENT: 215 BURLINGTON RD.SO., BRIDGETON, NJ 08302

AT ALL TIMES HEREAFTER MENTIONED, DEFENDANT SHERITA LATIMORE-COLLIER, IS THE SITE MEDICAL DIRECTOR AT SOUTH WOODS STATE PRISON AND WHO HAD THE DUTY TO SUPERVISE AND OVERSEE ALL MEDICAL TREATMENT THAT WAS GIVEN BY BY EMPLOYEES OF UCHCR TO INMATES AT SOUTH WOODS STAT PRISON.

E. FOURTH DEFENDANT:

NAME: VICTORIA D'AMICO

OFFICIAL POSITION: NURSE PRACTITIONER OF S.W.SP.

PLACE OF EMPLOYMENT: 215 BURLINGTON RD. SO., BRIDGETON, NJ 08302

AT ALL TIMES ~~WHICH~~ HEREINAFTER MENTIONED, DEFENDANT VICTORIA
D'AMICO WAS A NURSE PRACTITIONER AT SOUTH WOODS STATE
PRISON.

G. FIFTH DEFENDANT:

NAME: ANTHONY THOMAS

OFFICIAL POSITION: MEDICAL OMBUDSMAN FOR S.W.S.P

PLACE OF EMPLOYMENT: 215 BURLINGTON RD. SO., BRIDGTON, NJ 08302

DUTY IS TO PROVIDE ASSISTANCE TO STATE INMATES WITH PROBLEMS AND COMPLAINTS. THE OFFICE FUNCTIONS INDEPENDENTLY OF THE STATE PRISON FACILITIES TO ENSURE THE DEVELOPMENT OF TRUST, CONFIDENTIALITY AND OBJECTIVITY BETWEEN THE OMBUDSMAN AND INMATES.

H. SIX DEFENDANT:

NAME: NEW JERSEY DEPARTMENT OF CORRECTIONS

OFFICIAL POSITION: GOVERNMENT AGENCY

PLACE OF EMPLOYMENT: WHITTLESEY RD., P.O. BOX 863, TRENTON, NJ
08625-0863

PROTECTS THE PUBLIC AND PROVIDES FOR THE CUSTODY, CARE,

DISCIPLINE, AND TRAINING OF PERSONS COMMITTED TO CORR-

ECTIONAL FACILITIES OR ON PAROLE.

I. SEVENTH DEFENDANT:

NAME: UNIVERSITY ~~UNIVERSITY~~ CORRECTIONAL HEALTH CARE RUTGERS

OFFICIAL POSITION: OPERATES THE MEDICAL FACILITIES AT S.W.S.P

PLACE OF EMPLOYMENT: WHITTLESEY DRD. BATES BUILDING 2ND FLOOR, TRENTON NJ
08625-0863

AT ALL TIME HEREINAFTER MENTIONED, DEFENDANT UNIVER-
SITY CORRECTIONAL HEALTH CARE RUTGERS (UCHCR), WHICH IS A
PART OF RUTGERS UNIVERSITY, OPERATES THE MEDICAL FACILI-
TIES AT SOUTH WOODS STATE PRISON.

J. EIGHTH DEFENDANT:

NAME: SANDRA MUELLEN

OFFICIAL POSITION: WARDEN OCEAN COUNTY JAIL

PLACE OF EMPLOYMENT _____

AT ALL TIME HEREAFTER MENTIONED, DEFENDANT SANDRA
MUELLEN, WAS THE WARDEN OF THE OCEAN COUNTY JAIL WHICH
IS A PART OF THE DEPARTMENT OF CORRECTIONS AND WAS THE
GOVERNMENTAL OFFICIAL WHO WAS IN CHARGE OF THE OPERATION
AND MANAGEMENT OF OCEAN COUNTY JAIL.

K. NINTH DEFENDANT:

NAME: DR. SANTANGELO

OFFICIAL POSITION: MEDICAL DIRECTOR OCEAN COUNTY JAIL

PLACE OF EMPLOYMENT: _____

AT ALL TIMES HEREIN AFTER MENTIONED, DEFENDANT DR. SAN-
TANGELO WAS/IS SITE MEDICAL DIRECTOR AT THE OCEAN COUNTY
COUNTY JAIL. ~~AND~~ ~~VARIOUS~~

L. TENTH DEFENDANT:

NAME: P.J. HOLDEN

OFFICIAL POSITION: LICENSE PRACTICAL NURSE FOR OCEAN COUNTY JAIL

PLACE OF EMPLOYMENT: _____

AT ALL TIMES HEREIN AFTER MENTIONED, DEFENDANT, P.J. HOLDEN

WAS A LICENSED PRACTICAL NURSE AT OCEAN COUNTY JAIL.

M. ELEVENTH DEFENDANT:

NAME: CORRECT CARE SOLUTIONS, INC.

OFFICIAL POSITION: OPERATES THE MEDICAL FACILITIES AT OCEAN COUNTY JAIL

PLACE OF EMPLOYMENT _____

AT ALL TIME HEREINAFTER MENTIONED, DEFENDANT CORRECT CARE

SOLUTIONS, INC., ~~OPERATES THE MEDICAL FACILITIES~~ OPERATES THE MEDICAL FAC-

ILITIES AT OCEAN COUNTY JAIL.

5. I previously have sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in the Statement of Claims on page 6.

☒ Yes ☐ No

If your answer is "Yes," briefly describe the steps taken, including how relief was sought, from whom you sought relief, and the results.

REF# SWSP-19042842 CONFIRM ISSUE WERE DIRECT TO U.C.H.C.R,
DR. COLLIER MEDICAL DIRECTOR, WERE DOCUMENTS CONFIRM DR. NEAL
RECOMMEND SURGERY. GRIEVANCE WAS SUBMIT TOTALLY WENT
AGAINST WHAT SPECIALIST STATE. ADMINISTRATIVE REMEDIES WAS
EXHAUSTED

If your answer is "No," briefly explain why administrative remedies were not exhausted.

6. Statement of Claims

(State here as briefly as possible the facts of your case. Describe how each defendant violated your rights, giving dates and places. If you do not specify how each defendant violated your rights and the date(s) and place of the violations, your complaint may be dismissed. Include also the names of other persons who are involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach a separate sheet if necessary.)

FIRST COUNT

1. PLAINTIFF IS AN INMATE AT SOUTH WOODS STATE PRISON WHICH
IS LOCATED IN BRIDGETON, NEW JERSEY. HE FORMERLY WAS AN IN-
MATE AT OCEAN COUNTY JAIL "OCEAN COUNTY DEPARTMENT OF
CORRECTIONS" IS LOCATED IN OCEAN COUNTY NEW JERSEY.

2. DEFENDANT, NEW JERSEY DEPARTMENT OF CORRECTION IS

CHARGED WITH THE RESPONSIBILITY TO MAINTAIN ALL OF THE NEW JERSEY STATE PRISONS AND TO MAKE CERTAIN THAT THE PRISON HOUSING UNITS FOR INMATES WITH DISABILITIES COMPLY WITH THE AMERICANS WITH DISABILITY ACT OF 1990 (ADA)

3. AT ALL TIMES HEREAFTER MENTIONED, DEFENDANT MARCUS O. HICKS, WAS THE COMMISSIONER OF THE NEW JERSEY DEPARTMENT OF CORRECTIONS AND WAS THE GOVERNMENTAL OFFICIAL WHO WAS IN CHARGE OF THE OPERATION AND MAINTENANCE OF ALL OF COUNTY JAILS, AND NEW JERSEY PRISONS. HE IS BEING SUED IN HIS OFFICIAL CAPACITY.

4. AT ALL TIMES HEREINAFTER MENTIONED, JOHN POWELL WAS THE ADMINISTRATOR OF SOUTH WOODS STATE PRISON AND WAS DIRECTLY IN CHARGE OF RUNNING SOUTH WOODS STATE PRISON WHICH INCLUDED THE SUPERVISION OF UNIVERSITY CORRECTIONAL HEALTH CARE, RUTGERS, MEDICAL DEPARTMENT, MEDICAL DIRECTOR, STAFF, WHO WORKED AT SOUTH WOODS STATE PRISON.

5. AT ALL TIMES HEREINAFTER MENTIONED, DEFENDANT, UNIVERSITY CORRECTIONAL HEALTH CARE (U.C.H.C), WHICH IS A PART OF RUTGERS UNIVERSITY, OPERATES THE MEDICAL FACILITIES AT SOUTH WOODS STATE PRISON.

6. AT ALL TIMES HEREIN AFTER MENTIONED, DEFENDANT, DR. SHERITA LATIMORE-COLLIER WAS/IS THE SITE MEDICAL DIRECTOR AT SOUTH WOODS STATE PRISON AND WHO HAD THE DUTY TO SUPERVISE AND OVERSEE ALL MEDICAL TREATMENT THAT WAS GIVEN BY EMPLOYEES OF UCHC TO INMATES AT SOUTH WOODS STATE PRISON.

7. Relief

(State briefly exactly what you want the Court to do for you. Make no legal arguments. Cite no cases or statutes.)

WHEREFORE, PLAINTIFF DEMANDS JUDGMENT ON THESE COUNTS FOR DAMAGES, COMPENSATORY AND PUNITIVE AGAINST DEFENDANTS NAMED IN ABOVE COMPLAINT TOGETHER WITH INTEREST, COSTS, AND ATTORNEY FEES.

STATEMENT OF CLAIMS "PAGE 2"

7. AT ALL TIMES HEREINAFTER MENTIONED, DEFENDANT VICTORIA D'AMICO WAS A NURSE PRACTITIONER AT SOUTH WOODS STATE PRISON.

8. ON AUGUST 17, 2019, PLAINTIFF SUBMITTED A REQUEST TO HAVE WHEELCHAIR HANDICAP CELL, DEFENDANTS HAD ACTUAL KNOWLEDGE OF AN OBJECTIVELY CRUEL CONDITION, AFFECTING QUALITY OF LIFE, EXCRUCIATING PAIN.

9. THIS REQUEST WAS DENIED BY DEFENDANTS UNIVERSITY CORRECTIONAL HEALTH CARE (UCHC), DR. SHERITA LATIMORE-COLLIER MED. DIR., VICTORIA D'AMICO, JOHN POWELL, AND ANTHONY THOMAS.

10. THE FAILURE ON THE PART OF DEFENDANTS, NEW JERSEY DEPARTMENT OF CORRECTIONS, MARCUS D. HICKS, ~~TOGETHER WITH~~ COMMISSIONER, AND JOHN POWELL, ADMINISTRATOR OF SOUTH WOODS STATE PRISON, SUPERVISED THE CONDUCT OF DEFENDANTS, UNIVERSITY CORRECTIONAL HEALTH CARE (UCHC), DR. SHERITA LATIMORE-COLLIER, VICTORIA D'AMICO, AND ANTHONY THOMAS AND THEREFORE A PARTY TO THE CONDUCT OF NAMED DEFENDANTS WHO VIOLATED PLAINTIFF'S EIGHTH AND FOURTEENTH AMENDMENT RIGHTS UNDER THE UNITED STATES CONSTITUTION, ARTICLE I, PARAGRAPH 12 OF THE NEW JERSEY CONSTITUTION, AND WITH THE AMERICAN WITH DISABILITIES ACT (ADA)

WHEREFORE, PLAINTIFF DEMANDS JUDGMENT ON THIS COUNT FOR DAMAGES, COMPENSATORY AND PUNITIVE, AGAINST DEFENDANTS, NEW JERSEY DEPARTMENT OF CORRECTIONS, MARCUS D. HICKS, COMMISSIONER, AND JOHN POWELL ADMINISTRATOR OF SOUTH WOODS STATE PRISON, AND UNIVERSITY CORRECTIONAL HEALTH CARE (UCHC), DR. SHERITA LATIMORE-COLLIER, VICTORIA D'AMICO, AND ANTHONY THOMAS. TOGETHER WITH INTEREST, COSTS, AND ATTORNEY FEES.

SECOND COUNT

1. PLAINTIFF REPEATS THE ALLEGATIONS OF PARAGRAPH 1, 2, 3, 4, 5, 6 AND 7 OF THE FIRST COUNT AS IF SET FORTH HEREIN AT LENGTH AND MAKES THEM A PART HEREOF.

2. ONCE U.C.H.C.R, DR. LATIMORE-COLLIER, VICTORIA D'AMICO, AND DR. NEAL MADE MEDICAL DECISION TO ISSUE PLAINTIFF'S A WHEELCHAIR CONFIRMS

STATEMENT OF CLAIMS "THIRD PAGE"

DEFENDANTS HAD ACTUAL KNOWLEDGE OF AN OBJECTIVELY CRUEL CONDITION, AFFECTING QUALITY OF LIFE, EXCRUCIATING PAIN. OVER THE YEARS NUMEROUS APPOINTMENTS FOR OPERATION WERE SCHEDULED, DOTO CENTRAL TRANSPORTATION ARRIVING LATE PEDCEDURE WERE CANCELLED. NOW ARRIVING AT UNIVERSITY HOSPITAL ON AUGUST 13, 2019, WAS INFORMED NO DOCTOR WAS ON STAFF TO PERFORM SAID OPERATION, AND OBTAIN ANOTHER SPECIALIST WOULD COST TOO MUCH. ABOVE ACTION STATE GROSS DELIBERATE INDIFFERENCE TO SERIOUS MEDICAL NEEDS OF PRISONERS CONSTITUTES EIGHTH AMENDMENT.

3. DEFENDANT OMBUDSMAN ANTHONY THOMAS, STATED ON GRIEVANCE ON AUGUST 19, 2019 THE FOLLOWING: ON 1/29, YOU SEEN DR. SHAKIR, DR. SHAKIR ADVISED AGAINST SURGERY. FOLLOW UP WITH DR. NEAL AT UNIVERSITY HOSPITAL WAS SCHEDULED AND YOU WERE SEEN ON 8/13. DR. NEAL IS SUGGESTING PHYSICAL MEDICINE REHAB TO CONSULT AND TREAT WITH CONSERVATIVE MEDICINE BY DR. STITIK. SURGERY WAS NOT RECOMMENDED BY DR. NEAL EITHER.

4. FIRST, PLAINTIFF DO NOT SEE DR. NEAL ON 8/13/2019, HE SEEN DR. JAVIER FERRANDIZ ON 8/13, WHO CONCURRED WITH DR. NEAL ASSESSMENT THAT OPERATION WAS WARRANTED; "HE STATES IN MEDICAL RECORDS" THAT AND I QUOTE "THE PATIENT IS INTERESTED IN PAIN MEDICATION AND SURGICAL TREATMENT IN A SHORT FUTURE, BUT BECAUSE HE IS A SMOKER, DENTAL AND MEDICAL CLEARANCE IS NEEDED, IN THE MEAN TIME, I REFERRED THE PATIENT TO PMR DR. STITIK FOR EVALUATION AND TREATMENT. (8/13 DEPOSITIONS: RETURN IF SYMPTOMS WORSEN OF FAIL TO IMPROVE.

5. THIS REQUEST WAS DENIED BY DEFENDANTS UNIVERSITY CORRECTIONAL HEALTH CARE (UCHC), DR. LATIMORE-COLLIER, VICTORIA D'AMICO, AND ANTHONY THOMAS.

6. THE DENIAL BY THE ~~DEFENDANTS~~ AFORESAID DEFENDANTS FOR A OPERATION SUBJECTED THE PLAINTIFF TO CRUEL AND UNUSUAL PUNISHMENT, CONSTITUTED DELIBERATE INDIFFERENCE TO PLAINTIFF'S NEEDS AND VIOLATED PLAINTIFF'S CONSTITUTIONAL RIGHTS UNDER THE EIGHTH AMENDMENT OF THE UNITED STATES CONSTITUTION AND ARTICLE I, PARAGRAPH 12 OF THE NEW JERSEY CONSTITUTION.

WHEREFORE, PLAINTIFF DEMANDS JUDGMENT ON THIS COUNT FOR DAMAGES COMPENSATORY AND PUNITIVE, AGAINST DEFENDANTS, UNIVERSITY CORRECTIONAL HEALTH CARE, DR. LATIMORE-COLLIER, VICTORIA D'AMICO, AND ANTHONY THOMAS TOGETHER WITH INTEREST, COSTS ATTORNEY'S FEES.

STATEMENT OF CLAIMS "FOURTH PAGE"

THIRD COUNT

1. PLAINTIFF REPEATS THE ALLEGATION OF PARAGRAPH 1, 2, 3 OF FIRST COUNT AND SECOND COUNT, AS IF SET FORTH HEREIN AT LENGTH AND MAKES THEM A PART HEREOF.
2. AFTER PLAINTIFF'S ATTORNEY PRESENTED PERSONAL INSURANCE CARD, PERMISSION FROM JUDGE TO RECEIVED HIP OPERATION WHILE HOUSED AT OCEAN COUNTY JAIL, WHICH IS PART OF DEPARTMENT OF CORRECTIONS.
3. THIS REQUEST WAS DENIED BY WARDEN SANDRA MUELLEN OF OCEAN COUNTY JAIL, DR. SANTANGELO MED. DIRECTOR, P.J. HOLDEN, AND CORRECT CARE SOLUTION, INC.,
4. THE DENIAL BY THE AFORESAID DEFENDANTS OF A SERIOUS NEEDED HIP OPERATION SUBJECTED THE PLAINTIFF TO CRUEL AND UNUSUAL PUNISHMENT, CONSTITUTED DELIBERATE INDIFFERENCE TO PLAINTIFF'S NEEDS AND VIOLATED PLAINTIFF'S CONSTITUTIONAL RIGHTS UNDER THE EIGHTH AMENDMENT OF THE UNITED STATES CONSTITUTION AND ARTICLE I, PARAGRAPH 12 OF THE NEW JERSEY CONSTITUTION.

WHEREFORE, PLAINTIFF DEMANDS JUDGMENT ON THIS COUNT FOR DAMAGES, COMPENSATORY AND PUNITIVE, AGAINST DEFENDANTS, WARDEN SANDRA MUELLEN, DR. SANTANGELO, P.J. HOLDEN, AND CORRECT CARE SOLUTION, INC., TO GETHER WITH INTEREST, COSTS, ATTORNEY FEES.

PLAINTIFF ALSO HEREBY DEMANDS A TRIAL BY JURY
AS TO ALL ISSUES RAISED HEREIN.

8. Do you request a jury or non-jury trial? (Check only one)

☒ Jury Trial () Non-Jury Trial

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24 day of ~~11~~ DECEMBER, 2016.

Carl Reavis

Signature of plaintiff*

(*EACH PLAINTIFF NAMED IN THE COMPLAINT MUST SIGN THE COMPLAINT
HERE. ADD ADDITIONAL LINES IF THERE IS MORE THAN ONE PLAINTIFF.
REMEMBER, EACH PLAINTIFF MUST SIGN THE COMPLAINT).

CARL BEAVIS #1081421-973897A
SOUTH WOODS STATE PRISON
215 BURLINGTON ROAD SOUTH
BRIDGETON, N.J. 08302

CLERK
UNITED STATES DISTRICT COURT
P.O. Box 2797
CAMDEN, N.J. 08101

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